

September 30, 2000

Jane E. Henney, M.D., Commissioner
FDA Dockets Management Branch
5630 Fishers Lane, Rm. 1061 (HFA-305)
Rockville, Maryland 20852

3290 '00 NOV -7 AIO:43

RE: Docket NO.s 00P-1211/CP1 and 99N-4282

Dear Dr. Henney:

I am writing in support of a legal petition filed with your agency on March 21st of this year by the Sierra Club and some 50 other citizen organizations, addressing concerns as to the safety of transgenic agricultural products. I feel strongly that even if transgenic foods could be guaranteed safe for human consumption, there would still be no assurance that unforeseeable hazards might not result from their release into the natural world. As you are no doubt aware, in May 2000, the Monsanto Company revealed that unexpected gene fragments had been discovered in its genetically modified soya beans.

Naturally, the company argues that the beans are nonetheless safe. In my opinion, however, it is more significant that not even company scientists really knew what they contained in the first place.

The toxic Bt gene implanted in corn has been found to alter soil chemistry and natural microbial life long after the plants themselves have decomposed; it is also known to harm beneficial species like the green lacewing. The biotech developers of Bt corn did not expect these side-effects due to insufficient testing. Despite such discoveries and the ongoing potential for more serious results, our government regulatory agencies have thus far placed agribusiness profits above the precautionary principle. I feel, however, that the understanding of genetic processes remains too rudimentary to justify commercial exploitation at the present time. Public health and a safe environment are too valuable to justify risky experiments using the American public as guinea pig.

More recently, the Kraft company has acted responsibly in recalling taco shells that contained traces of unapproved corn. Although I applaud Kraft's prompt action, the incident demonstrates how easily accidents can occur. For all of these reasons, I ask you to rescind the 1992 policy on genetically engineered foods and instead implement regulations for these products in compliance with the Federal Food, Drug and Cosmetic Act.

Thank you for your attention to this serious societal issue.

Sincerely,

Ruth Pogacar

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